Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating, Renewal
Permit: F-08-012
FKI Logistex
1524 Lebanon Road
Danville, KY 40442
March 10, 2008

Frough Q. Sherwani, Reviewer

SOURCE ID: 21-021-00007

AGENCY INTEREST: 375

ACTIVITY NUMBER: APE20040002

SOURCE DESCRIPTION:

The source manufactures conveyor equipment for miscellaneous industries in Danville, Kentucky. The source has a spray paint booth, powder coating station, and two boilers for heating (4.375 MMbtu/hr, each natural gas as a primary fuel and Fuel oil # 2 as a secondary fuel).

COMMENTS:

On March 22, 2005, the Division received an application from the source for the renewal of their permit F-00-017 issued on August 29, 2000 and a name change from "FKI Industries Inc. Mathews Conveyors Division" to "FKI Automation Inc.".

On April 29, 2005, the Division received an application from the source for another name change from "FKI Automation Inc." to FKI Logistex".

On November 07, 2005, the Division received an application for a boiler replacement.

TYPE OF CONTROL AND EFFICIENCY:

The spray paint booth will use panel filters with a control efficiency of 95% to control particulate matter emissions associated with the spray paint booth. Also, a 65% transfer efficiency will be assumed for the spray painting operations.

EMISSION FACTORS AND THEIR SOURCE:

AP -42.5^{th} edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

APPLICABLE REGULATIONS:

401 KAR 52:030. Federally enforceable permits for non-major sources.;

401 KAR 59:010, New process operations;

401 KAR 59:015, New indirect heat exchangers

EMISSION AND OPERATING CAPS DESCRIPTION:

- a. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- d. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
- e. For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lb/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.